

Exhibit 4

Powell, Brent

From: Simpson, Carter C. <csimpson@hunton.com>
Sent: Wednesday, August 26, 2020 2:16 PM
To: Powell, Brent; Bakowski, Alan W.; Rich, Ryan G.; Phair, Ryan P.; Lamberth, James A.; jason.evans@troutman.com; Oeltjenbruns, Kelly; Martin, Jack; Hahm, Kevin; Brown, Todd
Cc: TMiller@bakerandmiller.com; michael.egge@lw.com; AMcDonald@bakerandmiller.com; Cooney III, James P.; Stone, Sarah Motley; eglavich@bakerandmiller.com
Subject: RE: Food Lion v. DFA - Letter re: 2nd RFPS

EXTERNAL EMAIL: Open Attachments and Links With Caution.

Thanks for this, Brent. MDVA is preparing a response to your letter from Monday evening, but in the interest of time I wanted to share with you our below revisions to a few requests from our Second Set of RFPs.

As promised, we discussed internally ways in which we could narrow Nos. 16, 24, 29, 31, 49, and 50, without excluding material that we believe is relevant to our claims. We suggest revisions to three of the requests below. For the remaining three, we understand your objection as to relevance and overbreadth, but believe that we can address your concerns through the negotiation of custodians and search terms. In particular, as discussed on our call, for Request Nos. 49 and 50, we anticipate that the parties will be able to identify search terms that go to the merits of the specific affirmative defenses that DFA now articulated and DFA's interrogatory responses due later today.

The below proposals should not be interpreted as agreement with the positions set forth in your August 24th letter and are made without prejudice to our right to enforce any of our requests for production. Specifically, documents that are no longer responsive to these requests due to our narrowing may nevertheless need to be produced as responsive to other of our requests.

Original RFP	Revised RFP
16. All expense reports, travel reports, and itineraries concerning or relating to meetings between DFA and Dean regarding the Asset Sale or any actual or proposed transaction involving Dean.	16. Documents sufficient to show all meetings between DFA and Dean regarding the Asset Sale or any actual or proposed sale of assets or supply transaction between DFA and Dean.
24. All financial statements, budgets, profit and loss statements, profitability reports, and other financial reports regularly prepared by or for DFA or Dean during the Relevant Time Period concerning or relating to the production, processing, or sale of raw or processed milk in, into, or from the Relevant Area.	24. Financial reports and statements, budgets, profit and loss statements, and profitability reports regularly prepared by or for DFA or Dean concerning the production, processing, or sale of raw or processed milk in, into, or from the Relevant Area.
29. To the extent not produced in response to Plaintiffs' First Requests, all documents concerning or relating to the supply of processed milk in, into, or from the Relevant Area by DFA, Dean, or a competitor, to Food Lion and other customers in connection with the purchase of raw or processed milk.	29. To the extent not produced in response to Plaintiffs' First Requests, documents concerning or relating to the supply of processed milk in, into, or from the Relevant Area by DFA, Dean, or a competitor, to Food Lion or other major customers in the Relevant Area.

Best,

Carter C. Simpson
Hunton Andrews Kurth LLP
w. 202-955-1850
c. 843-618-7917

From: Powell, Brent <Brent.Powell@wbd-us.com>
Sent: Monday, August 24, 2020 8:09 PM
To: Bakowski, Alan W. <alan.bakowski@troutman.com>; Rich, Ryan G. <r-rich@hunton.com>; Simpson, Carter C. <csimpson@hunton.com>; Phair, Ryan P. <rphair@hunton.com>; Lamberth, James A. <james.lamberth@troutman.com>; jason.evans@troutman.com; Oeltjenbruns, Kelly <KOeltjenbruns@hunton.com>; Martin, Jack <jmartinj@hunton.com>; Hahm, Kevin <KHahm@hunton.com>; Brown, Todd <tbrown@hunton.com>
Cc: TMiller@bakerandmiller.com; michael.egge@lw.com; AMcDonald@bakerandmiller.com; Cooney III, James P. <Jim.Cooney@wbd-us.com>; Stone, Sarah Motley <Sarah.Stone@wbd-us.com>; eglavich@bakerandmiller.com
Subject: RE: Food Lion v. DFA - Letter re: 2nd RFPS

Counsel,

Please see the attached letter following up on our call last week.

Best,

Brent Powell

From: Powell, Brent <Brent.Powell@wbd-us.com>
Sent: Tuesday, August 18, 2020 4:59 PM
To: Bakowski, Alan W. <alan.bakowski@troutman.com>; Rich, Ryan G. <r-rich@hunton.com>; Simpson, Carter C. <csimpson@hunton.com>; Phair, Ryan P. <rphair@hunton.com>; Lamberth, James A. <james.lamberth@troutman.com>; jason.evans@troutman.com; Oeltjenbruns, Kelly <KOeltjenbruns@hunton.com>; Martin, Jack <jmartinj@hunton.com>; KHahm@huntonak.com; tbrown@huntonak.com
Cc: TMiller@bakerandmiller.com; michael.egge@lw.com; AMcDonald@bakerandmiller.com; Cooney III, James P. <Jim.Cooney@wbd-us.com>; Stone, Sarah Motley <Sarah.Stone@wbd-us.com>; eglavich@bakerandmiller.com
Subject: Food Lion v. DFA - Letter re: 2nd RFPS

Counsel,

Please see the attached correspondence regarding plaintiffs' second requests for production of documents.

Best,

Brent

Brent Powell
Partner
Womble Bond Dickinson (US) LLP

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